

1 THE HONORABLE RICHARD A. JONES
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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

9 BLACK LIVES MATTER SEATTLE-
10 KING COUNTY, ABIE EKENEZAR,
11 SHARON SAKAMOTO, MURACO
12 KYASHNA-TOCHA, ALEXANDER
13 WOLDEAB, NATHALIE GRAHAM,
14 AND ALEXANDRA CHEN,
15

Plaintiffs,

v.

CITY OF SEATTLE,

Defendant.

No. 2:20-cv-00887-RAJ
DECLARATION OF AUBREANNA INDA
IN SUPPORT OF MOTION FOR
TEMPORARY RESTRAINING ORDER

17 I, Aubreanna Inda, declare and state as follows:
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19 1. The information contained in this declaration is true and correct to the best of my
20 knowledge, and I am of majority age and competent to testify about the matters set forth herein.

21 2. I am a twenty-six-year-old student currently working towards my degree in
22 Criminal Justice. I plan to attend University of Washington School of Law as the next step
23 toward my goal of becoming an attorney. I have lived in Seattle for almost two years.

24 3. I remember trusting police as a child. I remember getting stickers from them and
25 being taught that they would protect me if I needed help. Unfortunately, I have personally

1 witnessed law enforcement abuse of people with mental illness, and other incidents that have led
 2 me to the belief that police brutality is real, and that it must be stopped.

3 4. I attended protests nearly every day between May 31 and June 7.

4 5. On May 30th or 31st I attended a protest that took place at, among other locations,
 5 Westlake Park in downtown Seattle. National Guard soldiers began advancing toward me and
 6 other protestors. There was mace or gas discharged into the air. It was so loud I just put my
 7 hands over my ears. As I turned away, a National Guard soldier hit me in my back with a baton
 8 with so much force that I nearly fell to the ground. I could feel the Guard soldiers pushing me
 9 from behind. I was afraid that I would be trampled. I was assisted by an EMT and another
 10 protestor, who helped me to the side of the crowd and to safety.

11 6. Also on that same day, at a different time, I was maced in the face by another law
 12 enforcement officer when I was with other protestors near Pike Place Market. There was no
 13 warning given and it was painful and disorienting.

14 7. Even though these experiences showed me that I could not rely on the protection
 15 of the police, I continued to attend protests, as I felt urgency and necessity to address the issues,
 16 and prevent further police brutality. I have often been at the front of the crowd, because I wanted
 17 to show the police that we were peaceful and that we meant no harm. I have tried to speak calmly
 18 to the police, to keep my voice level, and to make sure they knew that they did not need to feel
 19 threatened by us. In my class on Multiculturalism, I have learned techniques for how to engage
 20 in dialogue with someone in a non-threatening way, so that they feel comfortable. I tried to use
 21 those skills when I spoke with the police.

22 8. I participated in a protest at Seattle's Capitol Hill near 11th Avenue and Pine
 23 Street on Sunday, June 7. I arrived on Capitol Hill around 7 p.m. with several friends. We set up
 24 a very small grill and cooked hot dogs and hamburgers, which we passed out to protestors, along
 25 with chips and water. We were careful to observe personal protection protocols and wore masks
 26 and gloves. We stayed off to the side of the crowd, out of the way.

1 9. Around 10:30 p.m., I could feel the tension rising between police and protesters. I
 2 could hear people yelling. I decided to walk to the front line to see if I could help diffuse the
 3 situation. At one point, they apparently mistook me for an activist ‘leader’ of the protests, so I
 4 attempted to speak with them. I tried to reassure them that we were unarmed, and that we were
 5 not a threat to them. I asked them why they felt threatened, and who they were fighting for, and
 6 they responded: Seattle government, and not for you. I was trying to show them that we were
 7 peaceful.

8 10. Some time later, I heard people yelling, including the police. The police used a
 9 megaphone, and I remember them saying something like “We don’t want to have to use our
 10 weapons on you.” I was telling people not to appear violent, and trying to get them to move out
 11 of the way. Along with several other protesters, I was at the front, acting as a buffer between the
 12 police and the rest of the protesters. People behind us began opening umbrellas to protect against
 13 chemicals. The police were repeating that they would get out their weapons. One of my friends
 14 was next to me, and he was standing with his hands in the air, holding flowers. Another friend
 15 was kneeling. I began to kneel, and I put my hands in the air. At that moment, I was shot square
 16 in the chest with a flash grenade and another flash grenade went off at my feet.

17 11. I got the wind knocked out of me completely. I couldn’t hear anything. My ears
 18 were ringing. I was hyperventilating, then I lost consciousness. I can remember smoke, and what
 19 seemed like fire.

20 12. Protesters quickly closed in around me and helped lift me off the ground and
 21 away from the frontline. No police officer attempted to provide assistance. I have since learned
 22 that police were talking about me over the police radio band, and were heard refusing to provide
 23 aid or respond to any calls for aid from protestors.

24 13. I did not have a pulse. I understand that volunteer medics rushed to my assistance
 25 and started chest compressions to bring me back to life. I opened my eyes briefly but quickly
 26 closed them because they felt like they were on fire from the pepper spray.

1 14. A medic called 911. It did not appear that an ambulance would get through the
 2 police line to assist me. Finally, my friend and several medics who had brought me to safety
 3 away from the crowd, and who had performed CPR even as I ‘flatlined,’ got me in a car and
 4 drove me to Virginia Mason hospital. They continued to perform CPR in the car, and medical
 5 staff continued to perform CPR on me at the hospital. I know this from talking to my friend and
 6 one of the medics.

7 15. The next morning, I woke up in the hospital with a tube down my throat. A doctor
 8 walked into my hospital room and asked me for my name. He told me that I went into cardiac
 9 arrest on the street and that if the volunteer medics had not provided on-site chest compressions,
 10 I might have died. I also went into cardiac arrest at the hospital two additional times, for a total
 11 of three times that night. In other words, I ‘died’ three times that night. The doctor told me that
 12 cardiac arrest can happen to anyone, no matter how young, when they suffer such an impact to
 13 the chest.

14 16. I was discharged from the hospital on Monday. Doctors advised me to stay an
 15 extra day for monitoring. For days following my discharge, my throat was very sore, and I tired
 16 easily. I couldn’t walk or stand for a long period of time without difficulty breathing. I felt like
 17 someone was standing on my chest. I have had vertigo and noises sound louder than usual. My
 18 chest still feels strange and hollow, and even wearing a seatbelt is uncomfortable. I wake up
 19 every morning with serious throat pain, possibly from being intubated because I wasn’t breathing
 20 on my own.

21 17. I continue to experience trauma from that night. When I close my eyes, I see the
 22 police shields in my face.

23 18. I am committed to ending police brutality. I do not want my story to detract from
 24 the message and the aims of the protests. I want people to listen to Black voices and understand
 25 that police brutality is systemic, and that it must be stopped. This story is not about me, it is

1 about continued police oppression and the lives that have been lost. I hope that people continue
2 to speak out and stand up for justice.

3 Executed this 11th day of June 2020 at Seattle, Washington.
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5 I declare under penalty of perjury under the laws of the United States and the State of
6 Washington that the foregoing is true and correct.
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8 By: 
9 AUBREANNA INDA
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